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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

CHRISTOPHER FREEMAN BROGDON,

Defendant,

-and-

CONNIE BROGDON, et al.,

Relief Defendants.

Civil Case No. 15-civ-8173

**NOTICE OF MONITOR'S
MOTION TO FILE
ATTACHMENTS TO THIRD
QUARTERLY REPORT
UNDER SEAL**

Return Date: November 21, 2016

**Document Filed
Electronically**

TO: All Counsel of Record

PLEASE TAKE NOTICE that on November 21, 2016, or soon thereafter as counsel

may be heard, the undersigned, attorneys for counsel for Soneet Kapila, Court-Appointed Monitor (the "Monitor"), shall move before the Honorable Kevin McNulty, U.S.D.J., of the United States District Court for the District of New Jersey, Martin Luther King, Jr. Federal Building and U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101 for entry of an Order, pursuant to L.Civ.R. 5.3(c), sealing the attachments to the third quarterly report being filed with the Court by the Monitor.

PLEASE TAKE FURTHER NOTICE that, in support of this motion, the Monitor is relying upon the Certification of C. Edward Dobbs filed simultaneously herewith.

PLEASE TAKE FURTHER NOTICE that, pursuant to L.Civ.R. 5.3(c), the Monitor submits herewith a proposed Order to Seal.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Rule 7.1(d)(4), no brief is necessary because the decision is left to the sound discretion of the Court under the guidance provided by Pansy v. Borough of Stroudsburg, 23 F.3d 772 (3d Cir. 1994). The Monitor consents to disposition of this Motion on the papers in accordance with Fed. R. Civ. P. 78.

Respectfully submitted,

Dated: October 28, 2016

By: /s/ Steven A. Karg
Steven A. Karg

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